

SHER TREMONTE LLP

March 18, 2022

**VIA ECF**

The Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED.

/s/ Alvin K. Hellerstein  
March 18, 2022

**Re:** *United States v. Thomas Irigoyen*  
Case No. 19-CR-226 (AKH)

Dear Judge Pauley:

We write on behalf of our client, Thomas Irigoyen, to respectfully request authorization for work-related travel. Specifically, Mr. Irigoyen seeks permission to travel from his home in Kingsburg, California to Boston, Massachusetts for employee training at the headquarters of his employer, a national property management firm that specializes in affordable and privatized military housing. If authorized, Mr. Irigoyen would fly to Boston on Sunday, March 20, 2022 and remain in Boston for the week. Upon completion of his employee training, Mr. Irigoyen would travel on March 27 to Manhattan in advance of his sentencing hearing, which is scheduled for March 29 at noon. We have spoken to Assistant U.S. Attorney Dan Wolf and he consents to the request. We appreciate the Court's consideration.

Respectfully submitted,

/s/  
Michael Tremonte  
Noam Biale

cc: All counsel (via ECF)